

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

DR. WILLIAM TOMASZEWSKI,
individually and on behalf of all others
similarly situated,

Plaintiff,

v.

TREVENA, INC., MAXINE GOWEN, and
DAVID SOERGEL,

Defendants.

No. 2:18-cv-04378-CMR

**LEAD PLAINTIFFS' MOTION FOR AN ORDER PRELIMINARILY APPROVING
PROPOSED CLASS ACTION SETTLEMENT AND AUTHORIZING
DISSEMINATION OF NOTICE TO THE SETTLEMENT CLASS**

Lead Plaintiffs Albert Koch, Whittier Pierce, Christopher Beyers, Kevin Walsh and Peter Palmer (“Lead Plaintiffs”) move this Court, pursuant to Federal Rule of Civil Procedure 23, for entry of an order: (i) preliminarily approving the proposed Settlement of the Action as set forth in the Stipulation and Agreement of Settlement dated April 19, 2021 (“Stipulation”); (ii) provisionally certifying the Settlement Class for purposes of effectuating the Settlement; (iii) directing that notice of the Settlement be provided to the Settlement Class Members in the form and manner proposed by Lead Plaintiffs; (iv) authorizing the retention of A.B. Data as the Claims Administrator; and (v) scheduling a date and time for the Settlement Fairness Hearing to consider final approval of the Settlement and related matters.¹

¹ All capitalized terms that are not otherwise defined herein shall have the meanings set forth in the Stipulation.

Lead Plaintiffs are contemporaneously filing a memorandum of law and Declaration of Jeffrey C. Block, with annexed exhibits, in support of this motion. A [Proposed] Order Preliminarily Approving Settlement and Providing for Notice, with exhibits thereto, is also submitted herewith. Defendants do not oppose the relief sought by this Motion.

April 19, 2021

Respectfully submitted,

/s/ Shanon J. Carson

Shanon J. Carson (PA Bar No. 85957)

Michael C. Dell'Angelo (PA Bar No. 80910)

BERGER MONTAGUE PC

1818 Market Street, Suite 3600

Philadelphia, PA 19103

(215) 875-3000 phone

(215) 875-4604 fax

scarson@bm.net

mdellangelo@bm.net

Liaison Counsel

Jeffrey C. Block, *pro hac vice*

Jacob A. Walker, *pro hac vice*

Nathaniel Silver, *pro hac vice*

BLOCK & LEVITON LLP

260 Franklin Street, Suite 1860

Boston, MA 02110

(617) 398-5600 phone

jeff@blockleviton.com

jake@blockleviton.com

nate@blockleviton.com

Lead Counsel

CERTIFICATE OF COUNSEL

Pursuant to Local Rule 7.1(b), it is hereby certified that this motion is unopposed.

/s/ Shanon J. Carson
Shanon J. Carson

CERTIFICATE OF SERVICE

I hereby certify that on April 19, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

/s/ Shanon J. Carson
Shanon J. Carson